



The Honorable J. Richard Creatura

UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF WASHINGTON
AT TACOMA

UNITED STATES OF AMERICA,

Plaintiff,

v.

CORY CROSBY,

Defendant.

NO. MJ17-5169

COMPLAINT FOR VIOLATION

18 U.S.C. § 2251(a), (e)

BEFORE, the Honorable J. Richard Creatura, United States Magistrate Judge, U. S.
Courthouse, Tacoma, Washington.

COUNT 1

(Production of Child Pornography)

Between July and August 2017, at Tacoma, within the Western District of Washington, and elsewhere, CORY CROSBY knowingly employed, used, persuaded, induced, enticed, and coerced CV1, a person under the age of eighteen, to engage in sexually explicit conduct, and attempt to do so, for the purpose of transmitting any live visual depiction of such conduct knowing and having reason to know that such visual depiction would be transmitted using any means and facility of interstate and foreign commerce and would be transmitted in and affecting interstate and foreign commerce and such visual depiction was transmitted using any means and facility of interstate and foreign commerce and in and affecting interstate and foreign commerce.

1 All in violation of Title 18, United State Code, Section 2251(a) and (e).

2 And the complainant states that this Complaint is based on the following
3 information:

4 I, Special Agent Ingrid Arbuthnot-Stohl, being duly sworn under oath, depose and
5 say:

6 **INTRODUCTION**

7 1. I am a Special Agent with the Federal Bureau of Investigation (FBI),
8 assigned to the Special Agent in Charge in Seattle, Washington. I have been an agent
9 with the FBI since December 2010. As part of my daily duties as an FBI agent, I
10 investigate criminal violations relating to child exploitation and child pornography,
11 including violations of Title 18, United States Code §§ 2251(a), 2252A, 2422, and 2423.
12 I have received training in the area of child pornography and child exploitation, and have
13 observed and reviewed numerous examples of child pornography in numerous forms of
14 media, including media stored on digital media storage devices such as computers,
15 iPhones, etc. I have also participated in the execution of numerous search warrants
16 involving investigations of child exploitation offenses. I have participated in numerous
17 operations targeting the trafficking of women and children for prostitution, and am versed
18 in the methods and motivations of those who sexually exploit women and children for
19 financial gain. I am a member of the Seattle Internet Crimes Against Children (ICAC)
20 Task Force in the Western District of Washington, and work with other federal, state, and
21 local law enforcement personnel in the investigation and prosecution of crimes involving
22 the sexual exploitation of children.

23 2. The facts set forth in this Complaint are based on my personal knowledge;
24 knowledge obtained from other individuals during this investigation, including other law
25 enforcement officers; review of documents and records related to this investigation;
26 communications with others who have personal knowledge of the events and
27 circumstances described below; and information gained through my training and
28 experience. I have not, however, set forth each and every fact known to me as a result of

1 | this investigation but only those facts I believe necessary to establish probable cause to
2 | conclude that CORY CROSBY committed the offense charged in this Complaint.

3 | **SUMMARY OF THE INVESTIGATION**

4 | 3. On October 2, 2017, FBI Special Agent Daniel J. Johns appeared before
5 | United States Magistrate Judge David W. Christel and applied for (and was granted) a
6 | warrant to search the Tacoma, Washington, home of CORY CROSBY. As SA Johns
7 | explained in the search warrant affidavit, his investigation revealed that CORY CROSBY
8 | has been enticing minors to create images and videos of themselves engaging in sexually
9 | explicit conduct and share them with him over the internet.

10 | 4. Assisted by other law enforcement, SA Johns and I executed that warrant
11 | on October 4, 2017. Upon entering the home, we encountered CROSBY. At our request,
12 | CROSBY agreed to come to the FBI office in Tacoma and be interviewed. After
13 | CROSBY was advised of his constitutional rights, he acknowledged he understood them
14 | and agreed to a recorded interview.

15 | 5. CROSBY explained that he moved into his current residence in the middle
16 | of May of this year. Among other things, CROSBY acknowledged using various
17 | internet-based video/chat applications to engage in chats with minors for several years.
18 | He explained that during these chats, he persuaded these minors to expose their genitals,
19 | masturbate, and/or engage in other sexual activity and produce photos or videos of this
20 | sexually explicit conduct. He stated that he would either have the minors send these
21 | photos and videos to him over the internet or simply record them engaging in sexually
22 | explicit conduct while it was streaming from a webcam. CROSBY further stated that he
23 | saved the sexually explicit images and videos of these minors on an external hard drive.

24 | 6. During the search of CROSBY's home, agents recovered a Western Digital
25 | external hard drive (S/N WX31DB6N8X0L) bearing a label indicating it was
26 | manufactured in Malaysia. A forensic preview of this external drive revealed it contained
27 | numerous folders, each of which CROSBY explained corresponded to a minor from
28 | whom he solicited sexually explicit images or videos. Among the folders on his drive

1 was a folder entitled "Encode." This folder included several dozen videos recorded from
 2 various internet-based video streaming services. CROSBY explained that each filename
 3 contained the victim's name, her age at the time the video was captured, and the date on
 4 which he captured it.

5 7. SA Johns provided descriptions of two such video files, and I include those
 6 below. Both of the videos described below are captures from an internet-based video
 7 streaming application. SA Johns has been a Special Agent of the FBI since March 2007
 8 and is currently assigned to the Philadelphia Division, Philadelphia, Pennsylvania. He
 9 has conducted numerous investigations involving computer crimes, particularly those
 10 related to child pornography and child exploitation. Over the course of his career, SA
 11 Johns has examined over 100,000 examples of child pornography images/videos.

12 **CV11320170711-185839.avi:** This video is fifty minutes and thirty-three
 13 seconds long. The video depicts a female (CV1), who is completely naked.
 14 During the video, she masturbates and digitally penetrates both her vagina and
 15 anus. The majority of the video is a close-angle depiction of her anus and vagina.
 16 CV1's body size, musculature, and physical development all appear consistent
 with a girl who is thirteen years old.

17 **CV11320170812-195043.mp4:** This video is one hour and sixteen minutes long
 18 and also depicts CV1. CV1 is completely naked throughout the video and is
 19 shown masturbating, digitally penetrating her vagina, performing oral sex on an
 20 artificial penis, and repeatedly inserting the artificial penis into her anus. As
 above, CV1's size, musculature, and physical development all appear consistent
 with a girl who is thirteen years old.

21 8. As CROSBY explained, the name of each file indicates that it was a
 22 recording of CV1, that CV1 was thirteen at the time, and that the first video was captured
 23 on July 11, 2017, while the second was captured on August 12, 2017. CROSBY also
 24 admitted that he had been soliciting sexually explicit images/videos from CV1 for
 25 approximately two years and that at the time he obtained the videos above, he knew that
 26 CV1 was thirteen years old.

27 //

28 //

CONCLUSION

9. Based on the above facts, I respectfully submit that there is probable cause to believe that CORY CROSBY did knowingly and unlawfully produce child pornography, in violation of Title 18, United States Code, Section 2251(a), (e).



Ingrid Arbuthnot-Stohl, Complainant
Special Agent, FBI

Based on the Complaint and Affidavit sworn to before me, and subscribed in my presence, the Court hereby finds that there is probable cause to believe the Defendant committed the offenses set forth in the Complaint.

Dated this 5th day of October, 2017.



J. RICHARD CREATURA
United States Magistrate Judge